

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

TRICIA BENTLEY,
Plaintiff,

vs.

HARRIS COUNTY.
Defendant.

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CIVIL ACTION NO. 4:19-CV-4235

DEFENDANT'S DESIGNATION OF EXPERTS

Defendant, Harris County makes these expert disclosures pursuant to Rule 26, Fed. R.Civ. P., and would respectfully show this Court as follows:

I. NON-RETAINED EXPERTS

Moustapha Gassama
Assistant County Attorney
1019 Congress, 15th Floor
Houston, Texas 77002
(713) 274-5326

Mr. Gassama is a non-retained expert who will testify regarding the reasonableness and necessity of the attorneys' fees sought by all the parties in this case, if any, and related issues. Mr. Gassama testimony will be based upon his knowledge and experience as a licensed and practicing attorney in Houston, Harris County, Texas where he has practiced for approximately eight years.

II. RIGHT TO ELICIT ANY EXPERT OPINION OR LAY OPINION TESTIMONY

Defendant reserves the right to elicit any expert opinion or lay opinion testimony at the time of trial which would be truthful, which would be of benefit to the jury to determine material

issues of fact, and which would not violate any existing court order or the Federal Rules of Evidence.

III. RESERVATION OF ADDITIONAL RIGHTS

Defendant reserves whatever additional rights they may have with regard to experts, pursuant to the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the case law construing same, and the rulings of the trial court, including, but not limited to, the right to designate rebuttal experts.

IV. RESERVATION OF RIGHT TO SUPPLEMENT DESIGNATION

Defendant reserves the right to supplement this designation with additional designations of experts within any time limits imposed by the Court or any alterations of same by subsequent court order or agreement of the parties pursuant to the Federal Rules of Civil Procedure and/or Federal Rules of Evidence.

Date: November 25, 2020

Respectfully submitted,

VINCE RYAN
HARRIS COUNTY ATTORNEY

/s/ Moustapha Gassama
MOUSTAPHA GASSAMA
Assistant County Attorney
Texas State Bar No. 24083058
Federal Bar No. 3588433
Moustapha.Gassama@cao.hctx.net
1019 Congress, 15th Floor
Houston, Texas 77002
(713) 274-5326 (telephone)
(713) 755-8924 (facsimile)
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on Wednesday, November 25, 2020, a true and correct copy of the foregoing pleading was delivered in accordance with the Federal Rules of Civil Procedure to the following:

Marjorie A. Murphy
The Murphy Law Practice, PLLC
3355 W. Alabama, Ste. 670
Houston, Texas 77098
Email: marjorie@themurphyllawpractice.com

/s/ Moustapha Gassama
Moustapha Gassama